

Message

From: Scianni, Melissa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=96DF5A77C72A4D109141A14DCF9E5C9B-MSCIANNI]
Sent: 12/17/2020 4:04:12 PM
To: Fitzgerald, Megan [fitzgerald.megan@epa.gov]
Subject: RE: IRT question re credits, flow duration

We have banks with ephemeral, intermittent, and perennial credits. However, I don't believe any of them restrict credits sales to in kind impacts. Rather, the Corps makes that assessment on their mitigation ratio checklist at the time of permitting. There might be restrictions for the secondary service area, I can't recall.

Below are a few banks that have these credits, if you want to go in RIBITS and check any of them. Look in Exhibit B for the GSA description.

Peterson Ranch (SPL)
Soquel (SPL)
Antonio Mountain Ranch (SPK)

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From: Fitzgerald, Megan <fitzgerald.megan@epa.gov>
Sent: Thursday, December 17, 2020 7:39 AM
To: Scianni, Melissa <Scianni.Melissa@epa.gov>
Subject: IRT question re credits, flow duration

Hi Melissa,

Do the GSAs (and BEIs) in R9 include restrictions based on flow condition? That limit the purchase of credits based on flow type?

I'm thinking of similar restrictions that are in place that limit the purchase of credits in banks that have both tidal and nontidal resources to ensure that impacts to nontidal are mitigated with nontidal credits and etc. I couldn't think of any examples that would go that far for flow duration but wanted to check in. This came up in a discussion at the MD IRT.

Thanks! Hope Olivia enjoyed her evening swim 🏊
Megan